

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Civil No. 25-30077-MGM
)
U.S. SPRINGFIELD MODEL 1868)
STYLE TRAPDOOR SADDLE RING)
CARBINE BEARING SERIAL NUMBER)
1444,)
Defendant *in Rem*.)

DECLARATION OF CAROL E. HEAD

I, Carol E. Head, make the following declaration:

1. I am an Assistant United States Attorney. I represent the plaintiff, the United States of America, in this case. This is an action *in rem* for forfeiture of the defendant property, described as U.S. Springfield Model 1868 Style Trapdoor Saddle Ring Carbine bearing serial number 1444 (the “Defendant Property”).
2. This action is governed by the procedures set forth in the Federal Rules of Civil Procedure and in Rule G of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions.
3. As described in the Affidavit of Pasquale Morra, Special Agent with the Federal Bureau of Investigation, attached as Exhibit A to the Verified Complaint for Forfeiture *in Rem* (the “Complaint”) in this case, the Defendant Property is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) because it represents any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of a specified unlawful activity, specifically violations of 18 U.S.C. § 641 (Theft of Public Property).
4. The Complaint was filed on April 29, 2025. See Docket No. 1.

5. This Court issued a Warrant and Monition on April 30, 2025, directing the United States to give notice to all persons concerned that the Complaint had been filed and to arrest and retain the Defendant Property in its custody. *See* Docket No. 4.

6. Publication of the Complaint and Warrant and Monition was made via the government website www.forfeiture.gov for thirty consecutive calendar days beginning on May 15, 2025, and ending on June 13, 2025. The Declaration of Publication was filed on July 22, 2025. *See* Docket No. 5.

7. All parties who may have had an interest in the Defendant Property (the Springfield Armory National Historic Site and Reed Knight) were served with a certified copy of the Warrant and Monition and a copy of the Complaint by certified mail or by other reasonable means, such as electronic service and/or FedEx. The Declaration of Carol E. Head Regarding Service of Process was filed on July 22, 2025. *See* Docket No. 6.

8. Under Rules G(5)(a)(ii)(A)-(B) and G(5)(b) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, any person asserting an interest in the Defendant Property was required to file a claim within thirty-five (35) days after direct notice was sent, or sixty (60) days after the first day of publication of notice on www.forfeiture.gov, and then was required to file an answer within twenty-one (21) days after filing their claim.

9. To date, no claims to the Defendant Property or answers to the Complaint have been filed, and the time for filing such claims and answers has expired.¹

¹ The undersigned Assistant United States Attorney anticipates that the Department of Interior, National Park Service, will prepare a petition for remission, pursuant to 28 C.F.R. Part 9, asking the Attorney General to remit the Defendant Property to the National Park Service, Springfield Armory National Historic Site, after entry of a final order of forfeiture.

10. To the best of my knowledge, and upon information and belief, no one with an interest in the Defendant Property is in the military service of the United States, is an infant, or is incompetent.²

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed this 31st day of July 2025, in Boston, Massachusetts.

/s/ Carol E. Head
CAROL E. HEAD
Assistant United States Attorney

² To determine military status, the United States is able to query the Department of Defense Manpower Data Center using an individual's full name and either their Social Security Number or their date of birth. The United States searched the Department of Defense Manpower Data Center with negative results.